

EXHIBIT C

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12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 IN RE: UBER TECHNOLOGIES, INC.,
17 PASSENGER SEXUAL ASSAULT
18 LITIGATION

19 Case No. 3:23-md-03084-CRB

20 Judge: Honorable Charles Breyer

21 **DECLARATION OF DANIEL KOLTA IN
22 SUPPORT OF DEFENDANTS' MAY 13,
23 2025 PRIVILEGE DISPUTE BRIEF
24 PURSUANT TO SPECIAL MASTER
25 ORDER NO. 4, § III, ¶ 2**

26 This Document Relates to:

27 ALL ACTIONS

28 **DECLARATION OF DANIEL KOLTA**

I, Daniel Kolta, having personal knowledge of the following state:

1. I am the Legal Director, Global Safety, at Uber. I was first employed by Uber in July 2018 and have worked as in-house legal counsel for the past 7 years. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier,

1 LLC, and Rasier-CA, LLC's May 13, 2025 Brief in Support of Uber's Privilege Assertions pursuant
2 to Special Master Order No. 4, § III, ¶ 2 (ECF 2933). The facts set forth herein are true and correct
3 and are based on my own personal knowledge, and I could and would competently testify thereto if
4 called.
5

6 2. I have reviewed the document referenced by privilege log number
7 JCCP_MDL_PRIVLOG083074, and I am familiar with the subject matter being discussed in this
8 chat. In particular, I am the "Daniel" referenced in the initial message of the chat started by Rebecca
9 Payne on March 23, 2021. I spoke with Ms. Payne before this chat was created and during that
10 conversation I explained to Ms. Payne in my capacity as an attorney for Uber that Uber's legal
11 department had performed an analysis to project the potential legal costs associated with implementing
12 a proposed rider safety program that could face a variety of legal challenges. Uber's legal department
13 undertook this investigation and analysis in anticipation of litigation. The estimated potential legal
14 cost in light of potential future legal challenges referenced in JCCP_MDL_PRIVLOG083074 was a
15 legal conclusion that required legal analysis and judgment of the types of potential causes of action
16 and challenges, the number of potential claimants, and the merits of the potential lawsuits. To reach
17 this legal conclusion, I and other Uber in-house attorneys researched and analyzed various federal and
18 state laws, along with case law interpreting and applying such laws, and Uber's prior litigation
19 experience. The participants of the chat designated as JCCP_MDL_PRIVLOG083074 reference,
20 discuss, and comment on the legal advice that I and other in-house attorneys provided concerning such
21 legal cost.
22

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.
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1 Executed on May 13, 2025.

2 By: 
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Daniel Kolta